

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

**ASSURED PARTNERS OF WASHINGTON
LLC,**

Plaintiff,

V.

MARK ACARREGUI and ALLIANT
INSURANCE SERVICES INC.,

Defendants.

NO. 2:20-cv-00290 BJR

**STIPULATED MOTION AND
AMENDED ORDER REGARDING
EXPEDITED DISCOVERY AND
PRELIMINARY INJUNCTION
BRIEFING**

Plaintiff AssuredPartners of Washington LLC (Assured), Defendant Mark Acarregui, and Defendant Alliant Insurance Services Inc. (Alliant), having come to certain agreements between them due to scheduling and logistics issues caused by the current COVID-19 crisis and pending discovery disputes, jointly request that this Court enter an order as follows:

- (1) Expedited discovery and briefing related to Assured's motion for a preliminary injunction shall proceed according to the amended schedule set forth in Exhibit A.
 - (2) The temporary restraining order (Dkt. 15) shall continue in full force and effect until the Court rules on Assured's motion for a preliminary injunction, if such a motion is filed according to the briefing schedule set forth in Exhibit A. If no motion is filed according to that briefing schedule, the temporary restraining order shall immediately

1 dissolve unless further agreement is made by the parties or the temporary restraining
2 order is continued by the Court for good cause.
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4 **EXHIBIT A**

5 **Amended Schedule for Expedited Discovery & Preliminary Injunction Briefing**

Prior Deadline	New Deadline	Event
On or before 5 p.m. PST on March 30, 2020	On or before 5 p.m. PST on April 6, 2020	Service of deposition notices. There shall be two depositions per side (including third parties). The parties shall meet and confer in good faith to agree on a comprehensive deposition schedule prior to the commencement of depositions. To the extent any side seeks a Rule 30(b)(6) deposition, written objections to topics of deposition shall be served within two days of service of the deposition notice and the parties shall meet and confer regarding the objections within one day of service of the objections.
April 7, 2020	May 1, 2020	Time to complete depositions. Each deposition shall be limited to four hours of testimony each (without prejudice to a party's ability to complete any deposition after Plaintiff's application for a preliminary injunction, if any, is adjudicated). The parties may conduct the depositions by a mutually-acceptable web-based interface for remote depositions (e.g., TSG Reporting's LiveLitigation software).
April 10, 2020	May 8, 2020	Plaintiff's deadline to file a motion for a preliminary injunction. Plaintiff shall file and serve its preliminary injunction papers by this date.
April 17, 2020	May 22, 2020	Defendants to oppose motion for a preliminary injunction. Defendants shall file and serve their opposition papers, if any, by this date.
April 21, 2020	May 29, 2020	Plaintiff's deadline to reply. Plaintiff shall file and serve any reply papers by this date.

Prior Deadline	New Deadline	Event
April 23, 2020	June 1, 2020	Date of Hearing. Plaintiff shall note its motion for preliminary injunction for hearing on this date. The parties may appear by telephone for oral argument regarding Plaintiff's motion for preliminary injunction.

DATED this 31st day of March, 2020.

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED this 1st day of April, 2020.

HONORABLE BARBARA J. ROTHSTEIN
UNITED STATES DISTRICT COURT JUDGE

1 Proposed by:

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